

Exhibit 1 - CAWP Gather Standards

ATTACHMENT 1: COMPREHENSIVE ANIMAL WELFARE PROGRAM FOR WILD HORSE AND BURRO GATHERS

STANDARDS

Developed by

The Bureau of Land Management
Wild Horse and Burro Program

in collaboration with

Carolyn L. Stull, PhD
Kathryn E. Holcomb, PhD
University of California, Davis
School of Veterinary Medicine

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WELFARE ASSESSMENT STANDARDS for GATHERS

CONTENTS

Welfare Assessment Standards

I. FACILITY DESIGN	2
A. Trap Site and Temporary Holding Facility	2
B. Loading and Unloading Areas.....	4
II. CAPTURE TECHNIQUE	5
A. Capture Techniques.....	5
B. Helicopter Drive Trapping	5
C. Roping	7
D. Bait Trapping.....	8
III. WILD HORSE AND BURRO CARE.....	8
A. Veterinarian.....	8
B. Care	9
C. Biosecurity	11
IV. HANDLING	12
A. Willful Acts of Abuse	12
B. General Handling	12
C. Handling Aids	12
V. TRANSPORTATION	13
A. General	13
B. Vehicles.....	14
C. Care of WH&Bs during Transport Procedures	15
VI. EUTHANASIA or DEATH.....	16
A. Euthanasia Procedures during Gather Operations.....	16
B. Carcass Disposal	17
Required documentation and responsibilities of Lead COR/COR/PI at gathers	18
Schematic of CAWP Gather Components.....	20

STANDARDS

Standard Definitions

Major Standard: Impacts the health or welfare of WH&Bs. Relates to an alterable equipment or facility standard or procedure. Appropriate wording is “must,” “unacceptable,” “prohibited.”

Minor Standard: unlikely to affect WH&Bs health or welfare or involves an uncontrollable situation. Appropriate wording is “should.”

Lead COR = Lead Contracting Officer’s Representative

COR = Contracting Officer’s Representative

PI = Project Inspector

WH&Bs = Wild horses and burros

I. FACILITY DESIGN

A. Trap Site and Temporary Holding Facility

1. The trap site and temporary holding facility must be constructed of stout materials and must be maintained in proper working condition, including gates that swing freely and latch or tie easily. (**major**)
2. The trap site should be moved close to WH&B locations whenever possible to minimize the distance the animals need to travel.(minor)
3. If jute is hung on the fence posts of an existing wire fence in the trap wing, the wire should be either be rolled up or let down for the entire length of the jute in such a way that minimizes the possibility of entanglement by WH&Bs unless otherwise approved by the Lead COR/COR/PI. (minor)
4. Fence panels in pens and alleys must be not less than 6 feet high for horses, 5 feet high for burros, and the bottom rail must not be more than 12 inches from ground level. (**major**)

5. The temporary holding facility must have a sufficient number of pens available to sort WH&Bs according to gender, age, number, temperament, or physical condition.
(**major**)
 - a. All pens must be assembled with capability for expansion. (**major**)
 - b. Alternate pens must be made available for the following: (**major**)
 - 1) WH&Bs that are weak or debilitated
 - 2) Mares/jennies with dependent foals
 - c. WH&Bs in pens at the temporary holding facility should be maintained at a proper stocking density such that when at rest all WH&Bs occupy no more than half the pen area. (minor)
6. An appropriate chute designed for restraining WH&Bs must be available for necessary procedures at the temporary holding facility. This does not apply to bait trapping operations unless directed by the Lead COR/COR/PI. (**major**)
7. There must be no holes, gaps or openings, protruding surfaces, or sharp edges present in fence panels or other structures that may cause escape or possible injury. (**major**)
8. Padding must be installed on the overhead bars of all gates and chutes used in single file alleys. (**major**)
9. Hinged, self-latching gates must be used in all pens and alleys except for entry gates into the trap, which may be secured with tie ropes. (**major**)
10. Finger gates (one-way funnel gates) used in bait trapping must be constructed of materials approved by the Lead COR/COR/PI. Finger gates must not be constructed of materials that have sharp ends that may cause injuries to WH&Bs, such as "T" posts, sharpened willows, etc. (**major**)
11. Water must be provided at a minimum rate of ten gallons per 1000 pound animal per day, adjusted accordingly for larger or smaller horses, burros and foals, and environmental conditions, with each trough placed in a separate location of the pen (i.e. troughs at opposite ends of the pen). Water must be refilled at least every morning and evening. (**major**)
12. The design of pens at the trap site and temporary holding facility should be constructed with rounded corners. (minor)

13. All gates and panels in the animal holding and handling pens and alleys of the trap site must be covered with materials such as plywood, snow fence, tarps, burlap, etc. approximately 48” in height to provide a visual barrier for the animals. All materials must be secured in place. **(major)**

These guidelines apply:

- a. For exterior fences, material covering panels and gates must extend from the top of the panel or gate toward the ground. **(major)**
 - b. For alleys and small internal handling pens, material covering panels and gates should extend from no more than 12 inches below the top of the panel or gate toward the ground to facilitate visibility of animals and the use of flags and paddles during sorting. (minor)
 - c. The initial capture pen may be left uncovered as necessary to encourage animals to enter the first pen of the trap. (minor)
14. Non-essential personnel and equipment must be located to minimize disturbance of WH&Bs. **(major)**
 15. Trash, debris, and reflective or noisy objects should be eliminated from the trap site and temporary holding facility. (minor)

B. Loading and Unloading Areas

1. Facilities in areas for loading and unloading WH&Bs at the trap site or temporary holding facility must be maintained in a safe and proper working condition, including gates that swing freely and latch or tie easily. **(major)**
2. The side panels of the loading chute must be a minimum of 6 feet high and fully covered with materials such as plywood or metal without holes that may cause injury. **(major)**
3. There must be no holes, gaps or openings, protruding surfaces, or sharp edges present in fence panels or other structures that may cause escape or possible injury. **(major)**
4. All gates and doors must open and close easily and latch securely. **(major)**

5. Loading and unloading ramps must have a non-slip surface and be maintained in a safe and proper working condition to prevent slips and falls. Examples of non-slip flooring would include, but not be limited to, rubber mats, sand, shavings, and steel reinforcement rods built into ramp. There must be no holes in the flooring or items that can cause an animal to trip. **(major)**
6. Trailers must be properly aligned with loading and unloading chutes and panels such that no gaps exist between the chute/panel and floor or sides of the trailer creating a situation where a WH&B could injure itself. **(major)**
7. Stock trailers should be positioned for loading or unloading such that there is no more than 12" clearance between the ground and floor of the trailer for burros and 18" for horses. (minor)

II. CAPTURE TECHNIQUE

A. Capture Techniques

1. WH&Bs gathered on a routine basis for removal or return to range must be captured by the following approved procedures under direction of the Lead COR/COR/PI. **(major)**
 - a. Helicopter
 - b. Bait trapping
2. WH&Bs must not be captured by snares or net gunning. **(major)**
3. Chemical immobilization must only be used for capture under exceptional circumstances and under the direct supervision of an on-site veterinarian experienced with the technique. **(major)**

B. Helicopter Drive Trapping

1. The helicopter must be operated using pressure and release methods to herd the animals in a desired direction and should not repeatedly evoke erratic behavior in the WH&Bs causing injury or exhaustion. Animals must not be pursued to a point of exhaustion; the on-site veterinarian must examine WH&Bs for signs of exhaustion. **(major)**

2. The rate of movement and distance the animals travel must not exceed limitations set by the Lead COR/COR/PI who will consider terrain, physical barriers, access limitations, weather, condition of the animals, urgency of the operation (animals facing drought, starvation, fire, etc.) and other factors. **(major)**
 - a. WH&Bs that are weak or debilitated must be identified by BLM staff or the contractors. Appropriate gather and handling methods should be used according to the direction of the Lead COR/COR/PI. **(major)**
 - b. The appropriate herding distance and rate of movement must be determined on a case-by-case basis considering the weakest or smallest animal in the group (e.g., foals, pregnant mares, or horses that are weakened by body condition, age, or poor health) and the range and environmental conditions present. **(major)**
 - c. Rate of movement and distance travelled must not result in exhaustion at the trap site, with the exception of animals requiring capture that have an existing severely compromised condition prior to gather. Where compromised animals cannot be left on the range or where doing so would only serve to prolong their suffering, euthanasia will be performed in accordance with BLM policy. **(major)**
3. WH&Bs must not be pursued repeatedly by the helicopter such that the rate of movement and distance travelled exceeds the limitation set by the Lead COR/COR/PI. Abandoning the pursuit or alternative capture methods may be considered by the Lead COR/COR/PI in these cases. **(major)**
4. When WH&Bs are herded through a fence line en route to the trap, the Lead COR/COR/PI must be notified by the contractor. The Lead COR/COR/PI must determine the appropriate width of the opening that the fence is let down to allow for safe passage through the opening. The Lead COR/COR/PI must decide if existing fence lines require marking to increase visibility to WH&Bs. **(major)**
5. The helicopter must not come into physical contact with any WH&B. The physical contact of any WH&B by helicopter must be documented by Lead COR/COR/PI along with the circumstances. **(major)**
6. WH&Bs may escape or evade the gather site while being moved by the helicopter. If there are mare/dependent foal pairs in a group being brought to a trap and half of an identified pair is thought to have evaded capture, multiple attempts by helicopter may

be used to bring the missing half of the pair to the trap or to facilitate capture by roping. In these instances, animal condition and fatigue must be evaluated by the Lead COR/COR/PI or on-site veterinarian on a case-by-case basis to determine the number of attempts that can be made to capture an animal. **(major)**

7. Horse captures must not be conducted when ambient temperature at the trap site is below 10°F or above 95°F without approval of the Lead COR/COR/PI. Burro captures must not be conducted when ambient temperature is below 10°F or above 100°F without approval of the Lead COR/COR/PI. The Lead COR/COR/PI will not approve captures when the ambient temperature exceeds 105 °F. **(major)**

C. Roping

1. The roping of any WH&B must be approved prior to the procedure by the Lead COR/COR/PI. **(major)**.
2. The roping of any WH&B must be documented by the Lead COR/COR/PI along with the circumstances. WH&Bs may be roped under circumstances which include but are not limited to the following: reunite a mare or jenny and her dependent foal; capture nuisance, injured or sick WH&Bs or those that require euthanasia; environmental reasons such as deep snow or traps that cannot be set up due to location or environmentally sensitive designation; and public and animal safety or legal mandates for removal. **(major)**
3. Ropers should dally the rope to their saddle horn such that animals can be brought to a stop as slowly as possible and must not tie the rope hard and fast to the saddle so as to intentionally jerk animals off their feet. **(major)**
4. WH&Bs that are roped and tied down in recumbency must be continuously observed and monitored by an attendant at a maximum of 100 feet from the animal. **(major)**
5. WH&Bs that are roped and tied down in recumbency must be untied within 30 minutes. **(major)**
6. If the animal is tied down within the wings of the trap, helicopter drive trapping within the wings will cease until the tied-down animal is removed. **(major)**
7. Sleds, slide boards, or slip sheets must be placed underneath the animal's body to move and/or load recumbent WH&Bs. **(major)**

8. Halters and ropes tied to a WH&B may be used to roll, turn, position or load a recumbent animal, but a WH&B must not be dragged across the ground by a halter or rope attached to its body while in a recumbent position. **(major)**
9. Animals captured by roping must be evaluated by the on-site/on-call veterinarian within four hours after capture, marked for identification at the trap site, and be re-evaluated periodically as deemed necessary by the on-site/on-call veterinarian. **(major)**

D. Bait Trapping

1. WH&Bs may be lured into a temporary trap using bait (feed, mineral supplement, water) or sexual attractants (mares/jennies in heat) with the following requirements:
 - a. The period of time water sources other than in the trap site are inaccessible must not adversely affect the wellbeing of WH&Bs, wildlife or livestock, as determined by the Lead COR/COR/PI. **(major)**
 - b. Unattended traps must not be left unobserved for more than 12 hours. **(major)**
 - c. Mares/jennies and their dependent foals must not be separated unless for safe transport. **(major)**
 - d. WH&Bs held for more than 12 hours must be provided with accessible clean water at a minimum rate of ten gallons per 1000 pound animal per day, adjusted accordingly for larger or smaller horses, burros and foals and environmental conditions. **(major)**
 - e. WH&Bs held for more than 12 hours must be provided good quality hay at a minimum rate of 20 pounds per 1000 pound adult animal per day, adjusted accordingly for larger or smaller horses, burros and foals. **(major)**
 - 1) Hay must not contain poisonous weeds, debris, or toxic substances. **(major)**
 - 2) Hay placement must allow all WH&Bs to eat simultaneously. **(major)**

III. WILD HORSE AND BURRO CARE

A. Veterinarian

1. On-site veterinary support must be provided for all helicopter gathers and on-site or on-call support must be provided for bait trapping. **(major)**

2. Veterinary support must be under the direction of the Lead COR/COR/PI. The on-site/on-call veterinarian will provide consultation on matters related to WH&B health, handling, welfare, and euthanasia at the request of the Lead COR/COR/PI. All decisions regarding medical treatment or euthanasia will be made by the on-site Lead COR/COR/PI. **(major)**

B. Care

1. Feeding and Watering
 - a. Adult WH&Bs held in traps or temporary holding pens for longer than 12 hours must be fed every morning and evening with water available at all times other than when animals are being sorted or worked. **(major)**
 - b. Water must be provided at a minimum rate of ten gallons per 1000 pound animal per day, adjusted accordingly for larger or smaller horses, burros and foals, and environmental conditions, with each trough placed in a separate location of the pen (i.e. troughs at opposite ends of the pen). **(major)**
 - c. Good quality hay must be fed at a minimum rate of 20 pounds per 1000 pound adult animal per day, adjusted accordingly for larger or smaller horses, burros and foals. **(major)**
 - i. Hay must not contain poisonous weeds or toxic substances. **(major)**
 - ii. Hay placement must allow all WH&Bs to eat simultaneously. **(major)**
 - d. When water or feed deprivation conditions exist on the range prior to the gather, the Lead COR/COR/PI should adjust the watering and feeding arrangements in consultation with the onsite veterinarian as necessary to provide for the needs of the animals. (minor)
2. Dust abatement
 - a. Dust abatement by spraying the ground with water must be employed when necessary at the trap site and temporary holding facility. **(major)**

3. Trap Site

- a. Dependent foals or weak/debilitated animals must be separated from other WH&Bs at the trap site to avoid injuries during transportation to the temporary holding facility. Separation of dependent foals from mares must not exceed four hours unless the Lead COR/COR/PI authorizes a longer time or a decision is made to wean the foals. (**major**)

4. Temporary Holding Facility

- a. All WH&Bs in confinement must be observed at least once daily to identify sick or injured WH&Bs and ensure adequate food and water. (**major**)
- b. Foals must be reunited with their mares/jennies at the temporary holding facility within four hours of capture unless the Lead COR/COR/PI authorizes a longer time or foals are old enough to be weaned during the gather. (**major**)
- c. Non-ambulatory WH&Bs must be located in a pen separate from the general population and must be examined by the BLM horse specialist and/or on-call or on-site veterinarian as soon as possible, no more than four hours after recumbency is observed. Unless otherwise directed by a veterinarian, hay and water must be accessible to an animal within six hours after recumbency. (**major**)
- d. Alternate pens must be made available for the following: (**major**)
 - 1) WH&Bs that are weak or debilitated
 - 2) Mares/jennies with dependent foals
- e. Aggressive WH&Bs causing serious injury to other animals should be identified and relocated into alternate pens when possible. (minor)
- f. WH&Bs in pens at the temporary holding facility should be maintained at a proper stocking density such that when at rest all WH&Bs occupy no more than half the pen area. (minor)

C. Biosecurity

1. Health records for all saddle and pilot horses used on WH&B gathers must be provided to the Lead COR/COR/PI prior to joining a gather, including: **(major)**
 - a. Certificate of Veterinary Inspection (Health Certificate, within 30 days).
 - b. Proof of:
 - 1) A negative test for equine infectious anemia (Coggins or EIA ELISA test) within 12 months.
 - 2) Vaccination for tetanus, eastern and western equine encephalomyelitis, West Nile virus, equine herpes virus, influenza, *Streptococcus equi*, and rabies within 12 months.
2. Saddle horses, pilot horses and mares used for bait trapping lures must not be removed from the gather operation (such as for an equestrian event) and allowed to return unless they have been observed to be free from signs of infectious disease for a period of at least three weeks and a new Certificate of Veterinary Examination is obtained after three weeks and prior to returning to the gather. **(major)**
3. WH&Bs, saddle horses, and pilot horses showing signs of infectious disease must be examined by the on-site/on-call veterinarian. **(major)**
 - a. Any saddle or pilot horses showing signs of infectious disease (fever, nasal discharge, or illness) must be removed from service and isolated from other animals on the gather until such time as the horse is free from signs of infectious disease and approved by the on-site/on-call veterinarian to return to the gather. **(major)**
 - b. Groups of WH&Bs showing signs of infectious disease should not be mixed with groups of healthy WH&Bs at the temporary holding facility, or during transport. **(minor)**
4. Horses not involved with gather operations should remain at least 300 yards from WH&Bs, saddle horses, and pilot horses being actively used on a gather. **(minor)**

IV. HANDLING

A. Willful Acts of Abuse

1. Hitting, kicking, striking, or beating any WH&B in an abusive manner is prohibited. **(major)**
2. Dragging a recumbent WH&B without a sled, slide board or slip sheet is prohibited. Ropes used for moving the recumbent animal must be attached to the sled, slide board or slip sheet unless being loaded as specified in Section II. C. 8. **(major)**
3. There should be no deliberate driving of WH&Bs into other animals, closed gates, panels, or other equipment. (minor)
4. There should be no deliberate slamming of gates and doors on WH&Bs. (minor)
5. There should be no excessive noise (e.g., constant yelling) or sudden activity causing WH&Bs to become unnecessarily flighty, disturbed or agitated. (minor)

B. General Handling

1. All sorting, loading or unloading of WH&Bs during gathers must be performed during daylight hours except when unforeseen circumstances develop and the Lead COR/CO/PI approves the use of supplemental light. **(major)**
2. WH&Bs should be handled to enter runways or chutes in a forward direction. (minor)
3. WH&Bs should not remain in single-file alleyways, runways, or chutes longer than 30 minutes. (minor)
4. Equipment except for helicopters should be operated and located in a manner to minimize flighty behavior . (minor)

C. Handling Aids

1. Handling aids such as flags and shaker paddles must be the primary tools for driving and moving WH&Bs during handling and transport procedures. Contact of the flag or paddle end of primary handling aids with a WH&B is allowed. Ropes looped around the hindquarters may be used from horseback or on foot to assist in moving an animal forward or during loading. **(major)**

2. Electric prods must not be used routinely as a driving aid or handling tool. Electric prods may be used in limited circumstances only if the following guidelines are followed:
 - a. Electric prods must only be a commercially available make and model that uses DC battery power and batteries should be fully charged at all times. **(major)**
 - b. The electric prod device must never be disguised or concealed. **(major)**
 - c. Electric prods must only be used after three attempts using other handling aids (flag, shaker paddle, voice or body position) have been tried unsuccessfully to move the WH&Bs. **(major)**
 - d. Electric prods must only be picked up when intended to deliver a stimulus; these devices must not be constantly carried by the handlers. **(major)**
 - e. Space in front of an animal must be available to move the WH&B forward prior to application of the electric prod. **(major)**
 - f. Electric prods must never be applied to the face, genitals, anus, or underside of the tail of a WH&B. **(major)**
 - g. Electric prods must not be applied to any one WH&B more than three times during a procedure (e.g., sorting, loading) except in extreme cases with approval of the Lead COR/COR/PI. Each exception must be approved at the time by the Lead COR/COR/PI. **(major)**
 - h. Any electric prod use that may be necessary must be documented daily by the Lead COR/COR/PI including time of day, circumstances, handler, location (trap site or temporary holding facility), and any injuries (to WH&B or human). **(major)**

V. TRANSPORTATION

A. General

1. All sorting, loading, or unloading of WH&Bs during gathers must be performed during daylight hours except when unforeseen circumstances develop and the Lead COR/CO/PI approves the use of supplemental light. **(major)**

2. WH&Bs identified for removal should be shipped from the temporary holding facility to a BLM facility within 48 hours. (minor)
 - a. Shipping delays for animals that are being held for release to range or potential on-site adoption must be approved by the Lead COR/COR/PI. (**major**)
3. Shipping should occur in the following order of priority; 1) debilitated animals, 2) pairs, 3) weanlings, 4) dry mares and 5) studs. (minor)
4. Planned
5. transport time to the BLM preparation facility from the trap site or temporary holding facility must not exceed 10 hours. (**major**)
6. WH&Bs should not wait in stock trailers and/or semi-trailers at a standstill for more than a combined period of three hours during the entire journey. (minor)

B. Vehicles

1. Straight-deck trailers and stock trailers must be used for transporting WH&Bs. (**major**)
 - a. Two-tiered or double deck trailers are prohibited. (**major**)
 - b. Transport vehicles for WH&Bs must have a covered roof or overhead bars containing them such that WH&Bs cannot escape. (**major**)
2. WH&Bs must have adequate headroom during loading and unloading and must be able to maintain a normal posture with all four feet on the floor during transport without contacting the roof or overhead bars. (**major**)
3. The width and height of all gates and doors must allow WH&Bs to move through freely. (**major**)
4. All gates and doors must open and close easily and be able to be secured in a closed position. (**major**)
5. The rear door(s) of the trailers must be capable of opening the full width of the trailer. (**major**)
6. Loading and unloading ramps must have a non-slip surface and be maintained in proper working condition to prevent slips and falls. (**major**)

7. Transport vehicles more than 18 feet and less than 40 feet in length must have a minimum of one partition gate providing two compartments; transport vehicles 40 feet or longer must have at least two partition gates to provide a minimum of three compartments. **(major)**
8. All partitions and panels inside of trailers must be free of sharp edges or holes that could cause injury to WH&Bs. **(major)**
9. The inner lining of all trailers must be strong enough to withstand failure by kicking that would lead to injuries. **(major)**
10. Partition gates in transport vehicles should be used to distribute the load into compartments during travel. **(minor)**
11. Surfaces and floors of trailers must be cleaned of dirt, manure and other organic matter prior to the beginning of a gather. **(major)**

C. Care of WH&Bs during Transport Procedures

1. WH&Bs that are loaded and transported from the temporary holding facility to the BLM preparation facility must be fit to endure travel. **(major)**
 - a. WH&Bs that are non-ambulatory, blind in both eyes, or severely injured must not be loaded and shipped unless it is to receive immediate veterinary care or euthanasia. **(major)**
 - b. WH&Bs that are weak or debilitated must not be transported without approval of the Lead COR/COR/PI in consultation with the on-site veterinarian. Appropriate actions for their care during transport must be taken according to direction of the Lead COR/COR/PI. **(major)**
2. WH&Bs should be sorted prior to transport to ensure compatibility and minimize aggressive behavior that may cause injury. **(minor)**
3. Trailers must be loaded using the minimum space allowance in all compartments as follows: **(major)**
 - a. 12 square feet per adult horse.
 - b. 6.0 square feet per dependent horse foal.
 - c. 8.0 square feet per adult burro.
 - d. 4.0 square feet per dependent burro foal.

4. The Lead COR/COR/PI in consultation with the receiving Facility Manager must document any WH&B that is recumbent or dead upon arrival at the destination.
(major)
 - a. Non-ambulatory or recumbent WH&Bs must be evaluated on the trailer and either euthanized or removed from the trailers using a sled, slide board or slip sheet.
(major)
5. Saddle horses must not be transported in the same compartment with WH&Bs.
(major)

VI. EUTHANASIA OR DEATH

A. Euthanasia Procedure during Gather Operations

1. An authorized, properly trained, and experienced person as well as a firearm appropriate for the circumstances must be available at all times during gather operations. When the travel time between the trap site and temporary holding facility exceeds one hour or if radio or cellular communication is not reliable, provisions for euthanasia must be in place at both the trap site and temporary holding facility during the gather operation. (major)
2. Euthanasia must be performed according to American Veterinary Medical Association euthanasia guidelines (2013) using methods of gunshot or injection of an approved euthanasia agent. (major)
3. The decision to euthanize and method of euthanasia must be directed by the Authorized Officer or their Authorized Representative(s) that include but are not limited to the Lead COR/COR/PI who must be on site and may consult with the on-site/on-call veterinarian. (major)
4. Photos needed to document an animal's condition should be taken prior to the animal being euthanized. No photos of animals that have been euthanized should be taken. An exception is when a veterinarian or the Lead COR/COR/PI may want to document certain findings discovered during a postmortem examination or necropsy. (minor)
5. Any WH&B that dies or is euthanized must be documented by the Lead COR/COR/PI including time of day, circumstances, euthanasia method, location, a

description of the age, gender, and color of the animal and the reason the animal was euthanized. (**major**)

6. The on-site/on-call veterinarian should review the history and conduct a postmortem physical examination of any WH&B that dies or is euthanized during the gather operation. A necropsy should be performed whenever feasible if the cause of death is unknown. (minor)

B. Carcass Disposal

1. The Lead COR/COR/PI must ensure that appropriate equipment is available for the timely disposal of carcasses when necessary on the range, at the trap site, and temporary holding facility. (**major**)
2. Disposal of carcasses must be in accordance with state and local laws. (**major**)
3. WH&Bs euthanized with a barbiturate euthanasia agent must be buried or otherwise disposed of properly. (**major**)
4. Carcasses left on the range should not be placed in washes or riparian areas where future runoff may carry debris into ponds or waterways. Trenches or holes for buried animals should be dug so the bottom of the hole is at least 6 feet above the water table and 4-6 feet of level earth covers the top of the carcass with additional dirt mounded on top where possible. (minor)

CAWP

REQUIRED DOCUMENTATION AND RESPONSIBILITIES OF LEAD COR/COR/PI

Required Documentation

Section	Documentation
II.B.5	Helicopter contact with any WH&B.
II.C.2	Roping of any WH&B.
III.B.3.a and	Reason for allowing longer than four hours to reunite foals with mares/jennies. Does not apply if foals are being weaned.
III.B.4.b	
III.C.1	Health status of all saddle and pilot horses.
IV.C.2.h	All uses of electric prod.
V.C.4	Any WH&B that is recumbent or dead upon arrival at destination following transport.
VI.A.5	Any WH&B that dies or is euthanized during gather operation.

Responsibilities

Section	Responsibility
I.A.10	Approve materials used in construction of finger gates in bait trapping
II.A.1	Direct gather procedures using approved gather technique.
II.B. 2	Determine rate of movement and distance limitations for WH&B helicopter gather.
II.B.2.a	Direct appropriate gather/handling methods for weak or debilitated WH&B.
II.B.3	Determine whether to abandon pursuit or use other capture method in order to avoid repeated pursuit of WH&B.
II.B.4	Determine width and need for visibility marking when using opening in fence en route to trap.
II.B.6	Determine number of attempts that can be made to capture the missing half of a mare/foal pair that has become separated.
II.B.7	Determine whether to proceed with gather when ambient temperature is outside the range of 10°F to 95°F for horses or 10°F to 100°F for burros.
II.C.1	Approve roping of any WH&B.
II.D.1.a	Determine period of time that water outside a bait trap is inaccessible such that wellbeing of WH&Bs, wildlife, or livestock is not adversely affected.
III.A.2	Direct and consult with on-site/on-call veterinarian on any matters related to WH&B health, handling, welfare and euthanasia.

- III.B.1.e Adjust feed/water as necessary, in consultation with onsite/on call veterinarian, to provide for needs of animals when water or feed deprivation conditions exist on range.
- III.B.4.c Determine provision of water and hay to non-ambulatory animals.
- IV.C.2.g Approve use of electric prod more than three times, for exceptional cases only.
- V.A.1 Approve sorting, loading, or unloading at night with use of supplemental light.
- V.A.2.a Approve shipping delays of greater than 48 hours from temporary holding facility to BLM facility.
- V.C.1.b Approve of transport and care during transport for weak or debilitated WH&B.
- VI.A.3 Direct decision regarding euthanasia and method of euthanasia for any WH&B; may consult with on-site/on-call veterinarian.
- VI.B.1 Ensure that appropriate equipment is available for carcass disposal.